

1 MELINDA HAAG (CABN 132612)  
United States Attorney

2 MIRANDA KANE (CABN 150630)  
3 Chief, Criminal Division

4 ADAM L. WRIGHT (MABN 661283)  
Assistant United States Attorney  
5 450 Golden Gate Ave., Box 36055  
San Francisco, California 94102  
6 Telephone: (415) 436-7200  
Fax: (415) 436-7234  
7 E-Mail: adam.wright@usdoj.gov

8 Attorneys for United States

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION  
12

13 UNITED STATES OF AMERICA )

No. CR 13-0059 EMC

14 v. )

15 PAUL GRUDZIEN and MEGHAN )  
16 GRUDZIEN, )

**AMENDED STIPULATION AND  
~~[PROPOSED]~~ ORDER EXCLUDING  
TIME**

17 DEFENDANTS )  
18 )

19 During the parties' appearance on February 1, 2013, the Court set March 20, 2013 as the  
20 date for the initial appearance in front of the Honorable District Court Judge Chen. During that  
21 appearance, counsel requested that time between February 1, 2013 and March 20, 2013 be  
22 excluded from any time limits applicable under 18 U.S.C. § 3161, for the purpose of effective  
23 preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that the ends of  
24 justice served by granting such an exclusion of time outweigh the best interests of the public and

25 ///

26 ///

27 ///

28 ///

STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME  
CR 13-0059 EMC

1 the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). At the February 1, 2013 hearing, the  
2 Court made findings consistent with that agreement.

3  
4  
5 SO STIPULATED:

6  
7 MELINDA HAAG  
United States Attorney

8  
9 DATED: February 1, 2013

10 /s/  
ADAM L. WRIGHT  
Assistant United States Attorney

11  
12 DATED: February 1, 2013

13 /s/  
RUSSELL GOODROW  
Attorney for PAUL GRUDZIEN

14  
15 DATED: February 1, 2013

16 /s/  
ADAM G. GASNER  
Attorney for MEGHAN GRUDZIEN

~~PROPOSED~~ ORDER

For the reasons stated above and at the February 1, 2013 hearing, the Court finds that exclusion from the time limits applicable under 18 U.S.C. § 3161 the period from February 1, 2013 through March 20, 2013 is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The failure to grant the requested exclusion of time would deny counsel for the defendant and for the government the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: February 5, 2013



THE HONORABLE MARIA-ELENA JAMES  
United States Magistrate Judge